

1 SIGAL CHATTAH, NVSBN 5634

2 United States Attorney

3 District of Nevada

4 DAVID PRIDDY, ILSBN 6313767

5 Special Assistant United States Attorney

6 Social Security Administration

7 Office of the General Counsel, Office 7

8 6401 Security Boulevard

9 Baltimore, MD 21235

10 Telephone: (510) 970-4801

11 Facsimile: (415) 744-0134

12 E-Mail: David.Priddy@ssa.gov

13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 SHANNON MARIE SCHURMAN

17 Plaintiff,

18 v.
19 FRANK BISIGNANO,
20 Commissioner of Social Security,¹

21 Defendant.

22) Case No.: 2:25-cv-00078-MDC

23)
24) **UNOPPOSED MOTION FOR**
25) **EXTENSION OF TIME**
26) **(FIRST REQUEST)**

27
28 Defendant, Frank Bisignano, Commissioner of Social Security (Defendant), respectfully
29 requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 11, filed
30 on April 11, 2025), currently due on May 12, 2025, by 30 days, through and including June 11, 2025.
31 Defendant further requests that the deadline for Plaintiff's optional reply brief be extended to June 25,
32 2025.

33
34
35 ¹ Frank Bisignano became the Acting Commissioner of Social Security on May 6, 2025. Pursuant to
36 Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland
37 Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of
38 the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 This is Defendant's first request for an extension of time to file a response. Good cause exists
2 for this extension. Counsel is currently in the process of determining whether a settlement agreement
3 is possible in this case. Additional time is required for Defendant's undersigned counsel and
4 specialized attorneys within the undersigned's office to consider this option. If the case cannot be
5 settled, then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Brief by
6 the new due date of June 11, 2025. Counsel for Defendant advised counsel for Plaintiff of the need for
7 this extension on May 8, 2025. Counsel for Plaintiff confirmed that Plaintiff does not object to this
8 request.

9 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
10 Brief, through and including June 11, 2025. This request is made in good faith and with no intention
11 to unduly delay the proceedings.

13 Dated: May 8, 2025

Respectfully submitted,

SIGAL CHATTAH
United States Attorney

/s/ David Priddy
DAVID PRIDDY
Special Assistant United States Attorney

IT IS SO ORDERED:

Hon. Maximilian E. Couvillon III
United States Magistrate Judge

DATED: 5/9/2025